

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

KATHERINE MOPPIN, as heir to the Estate  
of John Henry Johnson, deceased; and as  
Special Administrator of the Estate of John  
Henry Johnson, deceased,

Plaintiff,

vs.

NATIONAL FOOTBALL LEAGUE,

Defendant.

Case No.: 12-cv-04028-AB

**STIPULATION TO AMEND COMPLAINT**

This Stipulation is made by and between Plaintiff and Defendant, by and through their counsel of record, with reference to the following facts:

WHEREAS, Plaintiff filed her Complaint in the Federal District Court for the Eastern District of Pennsylvania on July 13, 2012;

WHEREAS, Plaintiff will file an amendment to the Complaint to add a party whom Plaintiff contends is an additional similarly-situated plaintiff, Evelyn Edine Lovetere, as surviving spouse of her deceased husband, John Lovetere, deceased;

WHEREAS, Defendant does not contest Plaintiff's amendment of the Complaint;

WHEREAS, Defendant's consent to Plaintiff's amendment of the Complaint to add an additional plaintiff is provided in light of the liberal standards for amending pleadings under Rule 15 of the Federal Rules of Civil Procedure and is without waiver of—and is with total reservation of—any of its defenses, arguments, and positions with regard to the Complaint, either as it currently exists or as amended, including but not limited to arguments concerning timeliness and limitations of actions, failure to state a claim, joinder and severance, or any other arguments. Plaintiff will not argue, and this Stipulation is not to be and cannot be taken to support any argument of purported waiver of any defense positions or arguments.

NOW THEREFORE, Plaintiff and Defendant, through their counsel of record, stipulate

to the following:

IT IS HEREBY STIPULATED that Defendant consents to Plaintiff's amendment of the Complaint.

DATED: December 19, 2013

KREINDLER & KREINDLER LLP

By: 

ANTHONY TARRICONE

Attorneys for Plaintiff

DATED: December 19, 2013

PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP

By: 

BRAD S. KARP

Attorneys for Defendant  
NATIONAL FOOTBALL LEAGUE

**Certificate of Service**

The undersigned hereby certifies that all counsel who have consented to electronic service are being served with a copy of the foregoing document via the Eastern District of Pennsylvania CM/ECF system on December 19, 2013.

/s/ Anthony Tarricone  
ANTHONY TARRICONE